# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)

In re:

: Case No.: 14-13564-elf

Gail Marie Chase : Chapter 13

fka Gail Marie Kehan : Judge Eric L. Frank

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

Debtor(s)

:

Wells Fargo Bank, N.A. : Date and Time of Hearing

Movant, : Place of Hearing

: October 17, 2017 at 09:30 a.m.

:

Gail Marie Chase : U.S. Bankruptcy Court fka Gail Marie Kehan : 900 Market Street

: Philadelphia, PA, 19107

William C. Miller

Respondents.

### NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Wells Fargo Bank, N.A. has filed a Response Deadline, and Hearing Date, and Motion for Relief from the Automatic Stay to permit Wells Fargo Bank, N.A. to foreclose on 3535 Chippendale St, Philadelphia, PA 19136 and Abandonment of Property (First Mortgage).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before October 12, 2017, you or your attorney must do **ALL** of the following:
  - A. File an answer explaining your position at:

#### Clerk, U.S. Bankruptcy Court

U.S. Bankruptcy Court 900 Market Street Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee, Office of the U.S. Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

William C. Miller 1234 Market Street Suite 1813 Philadelphia, PA 19107 ecfemails@ph13trustee.com

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on October 17, 2017 at 09:30 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #1, Philadelphia, PA, 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE:	9/27/17	

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In re:

Case No.: 14-13564-elf

Gail Marie Chase : Chapter 13

fka Gail Marie Kehan : Judge Eric L. Frank

\*\*\*\*\*\*

**Debtor** 

:

Wells Fargo Bank, N.A. : Date and Time of Hearing

**Movant,** : Place of Hearing

vs : October 17

October 17, 2017 at 09:30 a.m.

Gail Marie Chase : U.S. Bankruptcy Court : 900 Market Street

fka Gail Marie Kehan : 900 Market Street : Philadelphia, PA, 19107

:

William C. Miller

Respondents.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Response Deadline, and Hearing Date, Certificate of No Objection and Motion for Relief from the Automatic Stay to permit Wells Fargo Bank, N.A. to foreclose on 3535 Chippendale St, Philadelphia, PA 19136 and Abandonment of Property (First Mortgage) was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, 1234 Market Street, Suite 1813, Philadelphia, PA 19107

Brad J. Sadek, Attorney for Gail Marie Chase FKA Gail Marie Kehan, Sadek and Cooper, 1315 Walnut Street, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on September <u>27</u>, 2017:

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Gail Marie Chase FKA Gail Marie Kehan, 3535 Chippendale Street, Philadelphia, PA 19136 Gail Marie Chase FKA Gail Marie Kehan, 3535 Chippendale St, Philadelphia, PA 19136 Wells Fargo Home Mortgage, 8480 Stagecoach Circle, Frederick, MD 21701

DATE: <u>9/27/17</u>	_
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### /s/ Karina Velter

Karina Velter, Esquire (94781) Kimberly A. Bonner (89705) Adam B. Hall (0088234) Sarah E. Barngrover (28840-64) Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

Telephone: 614-220-5611 Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com